

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Shayla Roshanda Brooks, Debtor

**Case No. 25-01017-JAW
CHAPTER 7**

MOTION TO EXTEND AUTOMATIC STAY

COMES NOW Debtor by and through their undersigned attorney, pursuant to 11 U.S.C. §362(c)(3)(B), and respectfully move this court to continue the automatic stay provided under 11 U.S.C. §362(a) as to all creditors, and in support thereof would show:

1. That this Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
2. That on 4/21/2025, Debtor filed the petition for relief under Chapter 7 in the instant cause.
3. That on or about 5/31/2024 Debtor filed a Chapter 13 proceeding, case number 24-01262, and said case dismissed on 03/28/2025.
4. That debtor filed the instant case in good faith and only after a substantial change in the financial and personal affairs of the Debtor.
5. That this motion is not made for the purposes of delay, but in good faith.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 7 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d). Debtors further requests any additional relief, general or specific, to which they may be entitled.

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:
Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Shayla Roshanda Brooks, Debtor

**Case No. 25-01017-JAW
CHAPTER 7**

**DECLARATION IN SUPPORT OF MOTION TO EXTEND THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(c)(3)**

The debtor, in support of the Motion to Extend the Automatic Stay, states as follows:

1. I have personal knowledge of the facts listed in the foregoing situation.
2. I am over the age of 18, of sound mind, am capable of making this Declaration, and am fully competent to testify to the matters stated herein.
3. I filed this bankruptcy petition on 4/21/2025.
4. I previously filed bankruptcy case number 24-01262. under Chapter 13 on 5/31/24 and that case was dismissed on 3/28/25.
5. I have had no other pending bankruptcy cases in the preceding one-year period.
6. I have not had any prior cases dismissed in the past year for any of the following reasons:
 - Failure to file or amend the petition or other required documents without substantial excuse;
 - failure to provide adequate protection as ordered by the Court; or
 - failure to perform the terms of a plan confirmed by the Court.
7. I have had a substantial change in my financial or personal affairs since the dismissal of the last case, and I believe that this case will result in a discharged chapter 7 case.
8. Those changes are as follows:

My prior case was a chapter 13, but my income was not stable. I am now filing a chapter 7 case to eliminate my debt.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04/21/2025

/s/ Shayla Roshanda Brooks
Shayla Roshanda Brooks

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Extend Automatic Stay and Declaration were forwarded on April 23, 2025, to:

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SHAYLA ROSHANDA BROOKS

CASE NO: 25-01017

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 7

On 4/23/2025, I did cause a copy of the following documents, described below,
Motion to Extend Stay and Declaration

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/23/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
SHAYLA ROSHANDA BROOKS

CASE NO: 25-01017

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 7

On 4/23/2025, a copy of the following documents, described below,
Motion to Extend Stay and Declaration

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/23/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 25-01017
SOUTHERN DISTRICT OF MISSISSIPPI
WED APR 23 8-31-45 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

ADVANCE AMERICA
750 SHIPYARD DR
STE 30
WILMINGTON DE 19801-5161

AFFIRM INC
ATTN BANKRUPTCY
650 CALIFORNIA ST
FL 12
SAN FRANCISCO CA 94108-2716

CAPITAL ONE
ATTN BANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

COMENITY BANK
ATTN BANKRUPTCY
PO BOX 182125
COLUMBUS OH 43218-2125

COMENITYCAPITALULTA
ATTN BANKRUPTCY DEPT
PO BOX 182125
COLUMBUS OH 43218-2125

CREDIT ONE BANK
ATTN BANKRUPTCY
6801 CIMARRON RD
LAS VEGAS NV 89113-2273

HILL LAW FIRM
PO BOX 150529
NASHVILLE TN 37215-0529

KEESLER FCU
ATTN BANKRUPTCY
2602 PASS RD
BILOXI MS 39531-2728

MARINER FINANCE LLC
ATTN BANKRUPTCY
8211 TOWN CENTER DRIVE
NOTTINGHAM MD 21236-5904

(P)MENDELSON LAW FIRM
PO BOX 17235
MEMPHIS TN 38187-0235

MERCURYFBT
ATTN BANKRUPTCY
PO BOX 84064
COLUMBUS GA 31908-4064

NAVIENT
ATTN BANKRUPTCY
PO BOX 9635
WILKES BARRE PA 18773-9635

ORTHOFI
900 S BROADWAY
STE 100
DENVER CO 80209-4269

RIVER OAKS
PO BOX 11439
BELFAST ME 04915-4005

SHELTER INSURANCE
PO BOX 6008
COLUMBIA MO 65205-6008

SYNCHRONY BANK
ATTN BANKRUPTCY
PO BOX 965060
ORLANDO FL 32896-5060

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6430
JACKSON MS 39201-5022~~

(P)UPGRADE INC
2 N CENTRAL AVE
10TH FLOOR
PHOENIX AZ 85004-4422

XFINITYCOMCAST
600 GALLERIA PKWY SE
ATLANTA GA 30339-5994

DEBTOR

SHAYLA ROSHANDA BROOKS
5671 BEECHWOOD DRIVE
JACKSON MS 39206-2708

~~EXCLUDE~~

~~STEPHEN SMITH
1052 HIGHLAND COLONY PKWY
SUITE 100
RIDGELAND MS 39157-8764~~

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~